

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In re: Jeffrey A. Brennan and Margaret J.
Brennan
Debtors

CHAPTER 13

BANKRUPTCY CASE NUMBER
18-15996/ELF

Jeffrey A. Brennan and Margaret J. Brennan,
Movant(s)/Debtors,
v.

Carrington Mortgage Services, LLC as
servicer for Bank of America, N.A.,
Respondent/Creditor

**RESPONSE OF CARRINGTON MORTGAGE SERVICES, LLC AS SERVICER FOR
BANK OF AMERICA, N.A. TO DEBTORS' MOTION TO VACATE RELIEF**

Carrington Mortgage Services, LLC as servicer for Bank of America, N.A., by and through its counsel, Shapiro & DeNardo, LLC, hereby responds to Debtors' Motion to Vacate Relief, and in support thereof, avers as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. It is admitted that the account is delinquent. The remaining allegations are denied.
7. Respondent is without information sufficient to admit or deny the allegations in paragraph 7.
8. Respondent is without information sufficient to admit or deny the allegations in paragraph 8. By way of further reply, the amount owed to cure the post-petition default is \$8,443.45. The breakdown is as follows:

Regular Payments of \$1,519.79 from 04/01/20 to 09/01/20 = \$9,118.74
Attorney Fees of \$800.00
Less Debtor's suspense of \$(1,475.29)

WHEREFORE, Carrington Mortgage Services, LLC as servicer for Bank of America, N.A. respectfully requests that confirmation of the Debtors' Motion to Vacate Relief be dismissed/denied.

Respectfully submitted,

/s/ Kristen D. Little

Dated: September 25, 2020

BY: _____
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